

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GONZALO CORNELIO BASURTO, individually
and on behalf of others similarly situated,
Plaintiff,

Index No.: 17-cv-07848(PGG)

-against-

VERIFIED ANSWER

KAHALA HOLDINGS LLC, KAHALA RESTAURANTS LLC,
KAHALA FRANCHISING LLC, KAHALA RESTAURANT
HOLDINGS LLC, KAHALA FRANCHISE CORP., KAHALA
BRANDS LTD., TWIN 161 CORP. (d/b/a BLIMPIE)
and REHAN KHAN,

Defendants.

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Defendants, TWIN 161 CORP. (d/b/a BLIMPIE) and REHAN KHAN, by their Attorneys, JOSEPH
A. ALTMAN, P.C., as and for their Verified Answer to the Plaintiff's Complaint, respectfully sets forth as
follows:

1. Denies having any knowledge or information sufficient to form a belief as to the truth of the
allegations contained in paragraphs numbered "1" → "6", "15" → "26", "29" → "33", "40" → "55", "57"
→ "60", "65", "66", "71", "91" → "93", "98" → "100" and "105" of the Plaintiff's Complaint.
2. Denies each and every allegation contained in the paragraphs numbered "7" → "14", "27",
"28", "34" → "39 (a-h)", "56", "61" → "64", "67" – "70", "72" → "89", "94" → "96", "100" → "103",
"106" → "108", "110" – "112", "114", "115", "117", "118", "120" → "122" of the Plaintiff's Complaint.
3. Repeats and realleges each and every statement in paragraphs "1", "2", and "3" above as to
each and every allegation in paragraphs "90", "97", "104", "109", "113", "116", and "119" of the
Plaintiff's Complaint.


AS AND FOR A FIRST DEFENSE

4. That this Court lacks jurisdiction since the Defendants' gross revenues are jurisdictionally
insufficient.

WHEREFORE, the Defendants demands Judgment dismissing the Plaintiff's Complaint herein, together with the costs and disbursements of this Action.

Dated: Bronx, New York
January 19th 2018

Yours, etc.,



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